

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GREATER BOSTON LEGAL SERVICES, *et al.*

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND
SECURITY, *et al.*

Defendants.

**DEFENDANTS' UNOPPOSED
MOTION FOR EXTENSION OF
PAGE LIMITATION**

Case No.: 1:21-cv-10083-DJC

Today, Defendants will file a motion to dismiss Plaintiffs' complaint. Defendants respectfully request a two-page extension of the page limit for their memorandum in support of that motion. Good cause exists for this motion.

1. Plaintiffs—lawyers, law firms, and a nonprofit legal services organization—brought this Administrative Procedure Act challenge against the U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, U.S. Immigration and Customs Enforcement, U.S. Customs and Border Protection, and each of their then respective agency heads in their official capacity.

2. Defendants' deadline to respond to the Complaint is today, and Defendants will file a motion to dismiss. The accompanying memorandum of law is two pages over the 20-page limit, due to the complexity of the issues. The Complaint challenges an alleged "nondisclosure policy" of records in civil immigration matters. Because it seeks relief across *all* civil immigration proceedings, Defendants' memorandum describes both the breath of different civil immigration proceedings generally and, for some proceedings, the procedures in place for adjudications, which necessitated some additional pages.

3. Undersigned counsel conferred with Plaintiffs' counsel who indicated that Plaintiffs do not oppose this motion to exceed the page limitations. *See infra* Rule 7.1(a)(2) Certification.

WHEREFORE, Defendants respectfully request that the Court grant a two-page extension of the page limit for Defendants' memorandum in support of their motion to dismiss.

April 19, 2021

BRIAN M. BOYNTON
Acting Assistant Attorney General

MARCIA BERMAN
BRIGHAM J. BOWEN
Assistant Branch Directors

/s/ Hilarie Snyder
HILARIE SNYDER
Trial Attorney
U.S. Department of Justice
Civil Division
Federal Programs Branch
1100 L Street NW
Washington, DC 20005
(202) 305-0747
hilarie.e.snyder@usdoj.gov

RULE 7.1(a)(2) CERTIFICATION

I communicated over email with counsel for Plaintiffs regarding this motion. Counsel indicated that Plaintiffs "have no objection to a possible motion" for five or less additional pages.

/s/ Hilarie Snyder
HILARIE SNYDER
Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify on this 19th day of April 2021 that I have filed this Motion with the Court's ECF system, which sends notice to Plaintiffs' Counsel identified on the NEF.

/s/ Hilarie Snyder
HILARIE SNYDER
Trial Attorney